

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO**

JOHN NOAKES

PLAINTIFF,

v.

THE UNIVERSITY OF CINCINNATI, ET  
AL.,

DEFENDANTS.

Case No. 1:23-cv-00284-MRB

Judge BARRETT

JOINT PLAN FOR LIMITED  
DISCOVERY REGARDING  
MOTION FOR PRELIMINARY  
INJUNCTION

The Parties have conferred and hereby jointly submit to the Court this Joint Plan to conduct limited discovery in advance of the October 2, 2023 hearing on Plaintiff's Motion for Preliminary Injunction. The Parties submit the following plan:

1. The parties shall serve requests for the production of documents by June 23, 2023.

The requests for the production of documents shall be limited to and focused upon the particular issues which relate to Plaintiff's Motion for Preliminary Injunction (Doc. # 3).

2. The parties shall conduct oral or written depositions by August 25, 2023. Each party may take no more than five depositions, including depositions of third-party and non-party individuals or entities. The depositions shall be limited to and focused upon the particular issues which relate to Plaintiff's Motion for Preliminary Injunction (Doc. # 3).

3. The discovery cutoff is August 25, 2023.

4. Plaintiff has withdrawn his Motion for Temporary Restraining Order (Doc. # 3).

The Parties submit the following briefing schedule for Plaintiff's Motion for

Preliminary Injunction (Doc. # 3):

- a. Defendants may file an Opposition to the Motion for Preliminary Injunction by September 11, 2023.
- b. Plaintiff may file a Reply to the Opposition to the Motion for Preliminary Injunction by September 27, 2023.

Respectfully submitted,

/s/ Joshua A. Engel

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